

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

T.H., et al.,

Plaintiffs,

v.

DeKalb County School District, et
al.,

Defendants.

Civil Action No. 1:19-cv-03268-TWT

**Joint Motion for Final Approval of Class Settlement as to the State
Defendants**

Plaintiffs T.H. and J.B., and Defendant Georgia Department of Education (“GaDOE”) and State Superintendent Richard Woods (“the State Superintendent”)¹ submit this Joint Motion for Final Approval of the Class Settlement. The Court previously certified the IDEA Class and Discrimination Subclass² pursuant to FRCP 23(e)(2). Doc. 162. The settlement, which the Court preliminarily approved on January 7, 2022, Doc. 254, is between the Plaintiff Class, on the one hand, and the GaDOE, on the

¹ Mr. Woods is named in his official capacity as the State Superintendent. Together, the DOE and the Superintendent are referred to as “the GaDOE.”

² Together, the IDEA Class and the Discrimination Subclass are referred to as the “Class.”

other. The settlement with the GaDOE for which the Parties now seek final approval constitutes a settlement of the Class's claims against some, but not all, of the Defendants in this action.

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, the Parties respectfully request that the Court grant the motion and enter an order granting final approval of the settlement agreement, entering it as an order, and retaining jurisdiction to enforce compliance with it. In support of this Motion, the Parties contemporaneously submit their Memorandum in Support and a Proposed Order.

Dated: April 4, 2022

Respectfully submitted,

/s/ Aaron Finch

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***COUNSEL FOR THE STATE
DEFENDANTS***

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2022, I electronically filed in the above styled action the foregoing **Joint Motion for Final Approval of Class Settlement as to the State Defendants** with the Clerk of the Court using the CM/ECF system which will automatically send e-mail notification to all counsel of record.

/s/ Aaron Finch
Aaron Finch